

Message

From: Mannix, John [mannixj@monroe.wednet.edu]
Sent: 12/12/2016 8:40:08 PM
To: Ramanauskas, Peter [ramanauskas.peter@epa.gov]
CC: Mullin, Michelle [Mullin.Michelle@epa.gov]; Moore, Kendall [moore.kendall@epa.gov]; Peachey, Robert [peachey.robert@epa.gov]; Deka Smith [smithf@monroe.wednet.edu]; piplicd@monroe.wednet.edu
Subject: Re: Sky Valley Remedial Completion Report Status
Attachments: Sky Valley PCB retesting_December 2016.pdf

Peter, et al.,

Please see my responses (in dark red) inline with the questions they pertain to below.

John Mannix

Assistant Superintendent, Operations

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200 E. Fremont St. Monroe, WA 98272



On Mon, Dec 12, 2016 at 8:07 AM, Ramanauskas, Peter <ramanauskas.peter@epa.gov> wrote:

Hello John,

We have some comments on the closeout report.

1) The Pod/Library Building section on page 6 states: "Caulking remains behind the unit ventilators in each of the twenty Pod Classrooms. The caulking fills the gap between the metal window frame and CAB transition in each of Classrooms #1 through #20 – 1,040 lf." Just for clarification, please confirm that 1,040 lf of caulking have been removed from the window frame/CAB transition and only limited caulking remains behind the unit ventilators

,

The 1,040 lf is the amount of accessible window frame/CAB transition that was scraped and removed

by the contractor. Keeping in mind that the amount of accessible caulking (i.e. caulking pressed out by the framing) was minimal and sometimes non-existent. Yes, only a limited amount of caulking remains behind the unit vents.

Best

guess

by Gregg Middaugh of PBS Environmental
would be

that only

a few linear feet of accessible caulking exists (at most) behind each of the 20 unit vents.

This is the specific material that I requested to be allowed to implement a Risk-Based Disposal as allowed under 40 CFR 761.61(c) and 761.62(c). Although we did not calculate the amount left behind the unit ventilators

, we
believe
it to be

a relatively minimal amount of material

. I can ask PBS Environmental to go back and calculate the amount left behind if you wish.

2) It seems that some pre-abatement wipe sample lab data is missing (e.g. Table 10 identifies a > 500 ug Room D wipe sample). This sample is notes as "100-PCB-W" in Table 10 on page 203, but does not appear in the data packages. The Figure on page 208 shows the Room D sample to be 046 Vinyl Floor. Please clarify and confirm all data is correctly presented in the report.

We collected IAQ related samples back in February

as part of the initial assessment of the facility

. In an effort to save time and money we used some of that data as pre-abatement samples. These IAQ related samples (Table 10 and figure) included those collected from the contaminated floor tile in Room D. As you know, that single tile was

removed early on and was not part of the

more recent PCB remediation

effort. Some of the data in Table 10

,
and the associated figure

,
does not apply and that is why there is no lab data

/report

attached.

3) With respect to the soil data presented in the report, SVEC needs to better identify which soil samples are the "post-abatement" samples. Soil is reported to exceed 1 ppm in samples 41373-12, -14, -16 -18, and -22. How were these soil areas remediated and confirmed to be < 1 ppm? There does not appear to be any information on disposal or removal of PCB impacted soils in this report.

When the contractor stated they were completed with soil removal at each of the exterior abatement locations we collected samples and found the soils at the following locations failed to meet the 1 ppm PCB soil cleanup clearance criteria;

- Annex Prep Rm F (Sample #12) – failed (5.7 ppm)
- Annex Room F (Sample #14) – failed (36 ppm)
- Annex Room E (Sample #16) – failed (2.6 ppm)

We asked the contractor to conduct additional soils removal at each of these “failed” locations.

When the contractor said they were

again

completed with soils removal at these 3 locations, PBS collected a second set of clearance samples.

- Annex Prep Rm F (Sample #18) – failed (1.7 ppm)
- Annex Room F (Sample #20) – passed (0.55 ppm)
- Annex Room E (Sample #22) – failed (1.22 ppm)

Two of those locations again failed to meet the criteria. We requested the contractor to conduct additional soils removal at the two “failed” locations.

When the contractor was completed

with this additional work

, PBS collected a third set of clearance samples.

- Annex Prep Rm F (Sample #23) – passed (0.54 ppm)
- Annex Room E (Sample #24) – passed (0.57 ppm)

Pre and post abatement sampling was performed at all locations w

h

ere caulking was removed. Pre-abatement soil sampling revealed no significant PCB contamination. As such, soil remediation was not part of the

scope of the abatement project.

Post abatement soil sampling revealed soils contamination.

According to PBS Environmental t

he soil contamination occurred because of inadequate contaminant controls during the window caulking abatement process. The soils cleanup was a standard part of the final abatement/clearance process.

PBS Environmental did not receive a standalone disposal manifest for the soils disposal.

4) Does the Clean Harbors manifest #010003598FLE identified as PAINT CHIPS/DUST/SANDBLAST MEDIA on the last page of the report include the removed caulk?

After discussions with the contractor it is our understanding that it includes the caulk and all associated abatement materials such as plastic sheeting, rags, filters, tape, etc.

5) For the air and wipe sampling to yet be collected, SVEC should identify whether the locations and quantities of future sampling will be in the same locations as the "post-abatement" samples identified in this report.

The air samples to be taken this month and in the future will be undertaken in all interior spaces where PCB caulk was removed during this abatement project (according to the May 25, 2016 Corrective Action Plan). Therefore it will indeed be undertaken in the same locations as the "post-abatement" samples identified in the Closeout Report.

The wipe samples to be taken this month and in the future are to be "representative" with a minimum of 25% of the interior spaces where PCB containing caulk was removed during the abatement being tested in any given round (according to the May 25, 2016 Corrective Action Plan). Our intent is to rotate among all post-abatement test locations with each subsequent round of wipe tests, but if you would prefer us to continue to test the same "post-abatement" locations -- 25% of the total number of locations -- in each instance please let me know.

Attached is a drawing showing the locations of air and wipe sampling that has been scheduled for this month (December 2016).

Please provide responses to the above comments.

Regards,

Peter

From: Mannix, John [mailto:mannixj@monroe.wednet.edu]

Sent: Thursday, December 01, 2016 6:57 PM

To: Mullin, Michelle <Mullin.Michelle@epa.gov>; Moore, Kendall <moore.kendall@epa.gov>

Cc: Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Peachey, Robert <peachey.robert@epa.gov>; Deka Smith <smithf@monroe.wednet.edu>; pipicd@monroe.wednet.edu

Subject: Re: Sky Valley Remedial Completion Report Status

Michelle, Kendall, Robert, and Peter,

Attached is a cover memo and the Final Closeout Report for the PCB Remediation project at Sky Valley Education Center. The report is just barely under 20 MB, so if it as not passed along by your email server please let me know and I can share it as a Google Doc.

Respectfully,

John Mannix

Assistant Superintendent, Operations

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200 E. Fremont St. Monroe, WA 98272



On Wed, Nov 30, 2016 at 11:07 AM, Mannix, John <mannixj@monroe.wednet.edu> wrote:

Peter, et al.,

Devlin, Gregg Middaugh (of PBS Environmental) and I were working on the draft close out report yesterday. We had finally received the certified waste handling documentation from NorthStar (our abatement contractor, who had been waiting to receive it from Clean Harbors, their hazardous materials disposal subcontractor) to include in the report.

I have a final version of the closeout report in hand and am working on the cover memo which will cover a couple of the items you had requested during our most recent telephone conference. I will hopefully have it to you later today, but given how busy things are these days, and how my workload is greatly impacted by my need to react

to issues as they arise, it may take me another couple days if there are significant interruptions.

Regards,

John

John Mannix

Assistant Superintendent, Operations

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200 E. Fremont St. Monroe, WA 98272



On Wed, Nov 30, 2016 at 6:19 AM, Ramanauskas, Peter <ramanauskas.peter@epa.gov> wrote:

Hello John/Devlin,

Writing in to check on the status of the remedial completion report we discussed earlier this month. Please let us know when we can expect to receive that.

Thank you,

Peter

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